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September 29, 2022

VIA HAND DELIVERY AND ELECTRONIC MAIL

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820

RE: Petro Industrial Solutions, LLC v. IPOS, et. al., Case No. 1:21-CV-00312

Dear Attorney Simpson:

This confirms our meet and confer held on September 29, 2022.

We were unable to agree as to **Interrogatories Nos. 1, 10 and 18**.

Plaintiff agreed to waive his insufficiency claims as to **Interrogatories Nos. 2, and 3**.

We could not agree as to **Demand for Production for Documents Nos. 37 and 41**. Plaintiff waived as to **Demand No. 12**.

You agreed to supplement as to **Demand No. 37**.

Cordially,


Lee J. Rohn, Esq.

LJR/kj